



**ENVIRONMENTAL PROTECTION DIVISION**

**Richard E. Dunn, Director**

**Land Protection Branch**  
2 Martin Luther King, Jr. Drive  
Suite 1054, East Tower  
Atlanta, Georgia 30334  
404-657-8600

July 31, 2017

City of Duluth  
c/o Mr. James Riker  
City Manager  
3167 Main Street  
Duluth, GA 30096

Re: Comments: Semi-Annual VRP Progress  
Report #2  
Former Duluth Dry Cleaners  
Tax Parcel ID # 6293.402  
Duluth, Gwinnett County, HSI # 10892

Dear Mr. Riker:

The Environmental Protection Division (EPD) is in receipt of the March 17, 2017, VRP Progress Report (Report) #2 for the Former Duluth Dry Cleaners, in Duluth, Gwinnett County, along with a July 28, 2017 email from Katie Ross, Wenck Associates, revising the potentiometric flow map after a telephone conversation with EPD. After completing a review of this report, EPD has prepared the following comments:

- 1) EPD agrees with the proposal to install a vertical cluster of wells at the site. However, EPD does not agree horizontal delineation is complete to the southeast of MW-2, which had a concentration of 660 mg/L of tetrachloroethene (PCE) in the March sampling event.

EPD also accepts the possibility discussed in the July 28<sup>th</sup> email that MW-7 is influenced by a leak in either the water main or stormwater drainage system nearby it. The revised potentiometric map better explains why concentrations of PCE and trichloroethene (TCE) found at MW-3 and MW-5 are not more comparable to each other.

EPD, therefore, suggests the City consider installation of a well to the east-southeast of MW-1 and MW-2 to both delineate southeast of MW-2, and to confirm the revised potentiometric map.

- 2) In reviewing the logs for the wells installed at the site, EPD observes an atypical pattern of varying well screen lengths; however, there is no discussion of the reason why. Typically, wells are installed with the same screen length, most usually 10 feet. Variances in screen lengths such as present at Duluth Dry Cleaner may result in sampling results not being representative of true groundwater quality. Please address this in the narrative.

Additionally, the log for MW-3 indicates the filter pack extends 12-feet above the top of the well screen. The other wells more closely adhere to the recommendation of extending a minimum of 2-feet above the top of the well screen<sup>1</sup>. Please address this in the narrative.

The above listed comments must be addressed to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. Please provide a response to the above listed comment as part of the next scheduled Progress Report submittal. If you should have any questions regarding this matter, please call Tom Brodell of the Response and Remediation Program at (404) 657-8600.

Sincerely,



David Brownlee  
Unit Coordinator  
Response and Remediation Program

c: Katie Ross, P.G., Wenck Associates <kross@wenck.com>

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<sup>1</sup> SESDGUID-101-R1, USEPA Region 4 SESD Guidance on the Design and Installation of Monitoring Wells, January 2013.